

1 DAVID TREILIER INTERVIEW OF CHRISTOPHER WILLIAMS
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3

4 April 10, 2012

5 Speakers:

6 CW Christopher Williams, Superintendent of Seattle Parks and Recreation
DT Dave Trieweiler, Counsel for Defendant
AT Andrew Tsoming, Assistant City Attorney

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8 DT This is Dave Trieweiler I'm here in the headquarters of the Seattle Parks Department on
9 Dexter Avenue--

10 CW Yes.

11 DT in Seattle. Today is April 10, 2012. It is about 2:05 PM. I'm here with Seattle Parks
12 Superintendent Christopher Williams

13 CW Yes.

14 DT And for the record would you state-- Are you aware that I'm recording this interview?

15 CW I am.

16 DT Thank you. And for the record would you state your full name and spell your last name?

17 CW Christopher Williams C-H-R-I-S-T-O-P-H-E-R Williams W-I-L-L-I-A-M-S

18 DT And I understand you're the acting superintendent of the Seattle Parks and Recreation?

19 CW Right.

20 DT Okay. And how long have you been in that position?

21 CW About two years

22 DT Okay. And were you appointed to that position by our current mayor?

23 CW Yes.

24 DT Okay and what did you do, what was your position--

1 CW I was deputy superintendent prior to that.

2 DT Okay and how long were you the deputy superintendent?

3 CW About five years.

4 DT What did you do before that?

5 CW I've been at the Parks Department for 20 years.

6 DT Oh, okay what position did you hold though before deputy superintendent?

7 CW I was at various division director manager positions of the department.

8 DT Did you ever have Jeff Hodges' position?

9 CW Never.

10 DT Where he issues-- I can't remember the title but the issues permits.

11 CW He issues permits, yes.

12 DT So you never had the position-- Were you ever in the position where that was your job is
13 your permits?

14 CW Never.

15 DT Okay. Is the mayor your current boss?

16 CW Yes.

17 DT Okay and so you serve at his pleasure? It's not a--

18 CW I do.

19 DT It's not a civil service kind of position. Okay. So do you regularly report to the mayor?

20 CW I regularly report to the deputy mayor, Ethan Rowe.

21 DT And do you do that in writing or verbally?

22 CW A whole lot of one-on-one meetings.

23 DT Okay.

1 CW And if I get an e-mail of course I respond to it.

2 DT Sure.

3 CW Phone calls...

4 DT Okay. How often?

5 CW Well, not very often. I probably have a one-on-one once a month.

6 DT Okay.

7 CW Probably hear from the deputy mayor a couple times a month on various issues.

8 DT Okay. What's your highest degree of formal education?

9 CW I have an MBA from Seattle U.

10 DT What was your undergraduate degree?

11 CW Business administration.

12 DT That was mine too.

13 CW All right.

14 DT I don't know why. I never went into business. Did you rely on any did you review any
15 documents in preparation for today's interview?

16 CW Oh, not so much. No.

17 DT Did you talk to anyone in preparation for today's interview?

18 CW No.

19 DT Since I talked scheduled the interview have you spoken with Jeff Hodges?

20 CW No.

21 DT Brock Milliern?

22 CW No.

23 DT Did you ever hold, yourself, Brock Milliern's position?

1 CW No.

2 DT Carl Marquardt?

3 CW Never.

4 DT Did you talk to him in preparation for today?

5 CW No.

6 DT Lisa Daugaard?

7 CW No.

8 DT Do you know Lisa Daugaard?

9 CW No. I've heard her name.

10 DT Okay I am here because I'm representing a guy who's charged with obstructing arising
11 out of an incident on Westlake Park on October 5th, 2011.

12 CW Okay.

13 DT Did you write any reports, memos, letters, e-mails, texts, or electronic records, or any
14 kind of records concerning the events surrounding Occupy Seattle and Westlake Park last
15 fall?

16 CW I don't believe. Actually the lead on this from my office was Eric Friedly our deputy
17 superintendent.

18 DT Oh, okay.

19 CW So kind of the way we divide work is kind of on a project-specific basis and Eric was the
20 guy who from this office who I designated to sort of be the administrative lead.

21 DT What's his position?

22 CW He is the acting deputy superintendent.

23 DT Okay. Is he still here?

1 CW He is still here.

2 DT Okay. I noticed I got copies of e-mails surrounding that event and I noticed that you
3 were on a lot of them and you may have even responded to a few.

4 CW I probably have responded to a few. But I don't remember.

5 DT Are you saying you'd didn't write any reports or memos or any kind of written or
6 electronic communications, other than e-mails about that event?

7 CW I don't recall writing anything other than e-mails regarding or responding to e-mails or
8 anything else like that you are able to pull them out and show them to me.

9 DT And I've got a bunch of e-mails. I didn't bring them to pull them out. I've got a couple
10 that I possibly might go through.

11 CW Very good.

12 DT Did you communicate with the mayor at that time about events at Westlake Park--
13 Occupy Seattle events?

14 CW Yes.

15 DT Okay. Did you communicate with them like a lot? Frequently? Daily? How would you
16 characterize it?

17 CW Well at one point, the mayor's office set up these call-in conference calls.

18 DT Mmm hmm.

19 CW You there were a couple of face-to-face meetings but that became impractical just
20 because of the numbers of people involved so there were telephone conference calls
21 where I might have-- I mean these conference calls went on for like every day for--
22 maybe every two or three days, for over a month and Eric sat in on most of those for the
23 Parks Department.

1 DT And did these conference calls take place before October 5 (which was the date when the
2 first arrests were made)?

3 CW I believe some of them did take place before that or actually I'm having a hard time
4 remembering that. I think there were some face-to-face meetings but that it seems that
5 most of the conference calls took place after that.

6 DT Okay.

7 CW Yeah I think that most of them took place after that.

8 DT But some before.

9 CW Yeah, I think some before.

10 DT Okay. And did you take any notes in those meetings?

11 CW Oh, no. I didn't take any notes about this issue.

12 [00:07:00]

13 DT Are you familiar with the ordinances codes regulations or other laws that govern the use
14 and operation of sales and parks?

15 CW Most definitely.

16 DT Okay I know what some of them are but I want to ask you what they are and make sure
17 I'm not missing them. What is the Seattle city code or ordinance that governs city parks?

18 CW Okay so there's a whole section of ordinance 18.12 of the Seattle Municipal Code that
19 regulates behaviors in parks. In addition to that you know that regulates things like
20 amplified sound, camping, sleeping, other activities where one would need a permit to
21 conduct those activities and then what we have in addition for supplemental to that is the
22 Park Department has taken all of the Seattle Municipal Codes and incorporated them into
23 a document called the code of conduct document. And this code of conduct is really a
24

1 collection of SMC's that characterize and more like code of conduct of behavior
2 document for parks.

3 DT Where would I get a copy of the code of conduct?

4 CW I can print a copy before you--

5 DT Yet that'd great.

6 CW Get you that right now.

7 DT Okay are there any other ordinances, laws, statutes, regulations that you're aware of that
8 govern the use and operation of Seattle city parks?

9 CW Well, I think you have to be more specific than that because again there are there are
10 whole-- there is a whole section of Seattle Municipal Code again that regulates
11 everything from camping--

12 DT That's 18.12?

13 CW Yes 18.2.

14 DT Okay, other than that.

15 CW We have permit process requires people to obtain a permit, well I guess that's a policy.
16 We have a pol--

17 DT Okay I'm going to get a little bit into the permit process. But I may as well ask this now.
18 Is that permit process governed by any ordinances, codes, Seattle codes, regulations, any
19 kind of written rules for how to do the permit process?

20 CW I believe the permit process is governed by some policies. It is also governed by --
21 certainly governed by -- a set of department policies.

22 DT And, where would I find those?

23 CW I can also get you that before you leave.

1 DT Okay, and are those policies available to the general public?

2 CW I believe they are, on our website.

3 DT Okay. Let's step back a minute from the permit process. I want to make sure I know all
4 of them. Other than Seattle Municipal Code 18.2, are there any other regulations or
5 codes that govern the city parks that you're aware of?

6 CW Let's see here... Seattle Municipal Code section 18.12, Code of Conduct. From a legal
7 standpoint that's what the Park Department uses to enforce rules.

8 DT Is the code of conduct-- So you're saying that's basically a summary of the ordinance--

9 CW Right it's a summary of the ordinance so you don't have to wade through all the legal
10 SMC text.

11 DT So that's something issued by the Parks Department to help the general public understand
12 understand regulations are?

13 CW Right.

14 DT Okay. All right. And the permit process: Is that government policies issued by the Parks
15 Department or are there other city ordinances or other codes that govern that?

16 CW So the superintendent has brought rule-making authority by city charter and that grant
17 broad rulemaking authorities that enforce behaviors in parts so there is a strong link to the
18 authority that the superintendent has and the city charter and beyond that...

19 DT And so the superintendent issued those policies that govern the permanent process?

20 CW Yes.

21 DT Okay. Got that.

22 CW Okay.

1 DT Any other regulations or ordinances that govern the issuing of a permit? A park use
2 permit.

3 CW Park use permits. Not right off the bat.

4 DT Okay. Are there any regulations or ordinances that apply specifically and only to
5 Westlake Park?

6 CW No other than during that time the ownership of Westlake Park-- part of it, most of it
7 most of it being in the street right-of-way, and actually, technically, being a street, you
8 know has been sort of, I think that's been a real issue in terms of how much of it is park
9 land and how much of it was street right-of-way.

10 [00:13:00]

11 DT Last October, October 2011-- I'm gonna call the whole area Westlake Plaza that most
12 people think of Westlake Park.

13 CW Okay.

14 DT Is all Westlake Park or is some of it Department of Transportation property?

15 CW Some of it up until just a few weeks ago was Department of Transportation property.
16 During the time when the Occupy movement was happening a very small corner of it
17 belonged Seattle Parks. A lot of it was considered street right-of-way and is under the
18 jurisdic-- Well it's owned under the jurisdiction of Seattle Department of Transportation
19 but managed as a part of Seattle Parks and Recreation.

20 DT Is there any kind of memorandum of understanding or other written agreement between
21 the Parks Department and SDOT as of last October to manage that DOT strip you're
22 talking about?

1 CW So, I believe during the time when you asked about the memos and that sort of thing, and
2 I believe we did receive an e-mail from Peter Hahn is the director of SDOT.

3 DT H-A-H-N?

4 CW H-A-H-N, yes. Authorized the Department to enforce park rules on SDOT right-of-way
5 and I believe it was in direct response to this whole Occupy thing.

6 DT I did see some e-mails about that. Other than that, were there any written agreements
7 between those two departments about the Parks Department managing--

8 CW I'd have to check on that. I think it's been such a long historical practice, well before my
9 time. Westlake Park has been managed as park since the early 70s, since worlds were
10 actually.

11 DT Why wasn't the whole-- I don't know if you know this, but why wasn't-- It was in the 70s
12 when it was expanded to its current configuration. Why wasn't the whole thing made into
13 a park? Do you know?

14 CW I don't.

15 DT Were they thinking maybe some day turn it back into a street?

16 CW I don't know what they were thinking. I think it just sort of evolved as a public square,
17 public plaza.

18 [00:15:46]

19 DT Okay. Is impossible to appeal to any one or any entity that denial of the Park use permit
20 or request?

21 CW It is possible to appeal a denial of a Park use permit request, and that would typically
22 come to the superintendent, and it happens all the time. Groups are not satisfied the
23 permit conditions, and they appeal those, sometimes they go directly to the mayor's office
24

1 sometimes they come here. Sometimes it's just aa discussion with Jeff Hodges and they
2 work it out.

3 DT Are there written procedures for appealing the denial of a permit, a park use permit?

4 CW No, no formal written procedures, but it happens.

5 DT Okay. Now in terms of things like issuing-- I'm trying to think of how broad to make this.
6 In terms of lines of authority, the Parks Department is under the control of the Mayor,
7 isn't it?

8 CW Yes, that's absolutely correct.

9 DT And so, does the mayor then have the authority to overrule the parks department's
10 decisions on issuing permits?

11 CW Absolutely.

12 DT Okay that's what I thought I just wanted to confirm with you. Okay what is-- Okay let
13 me back up. Now I obviously talked to some people and done some research; I have
14 some ideas about how these things work but you're the superintendent so I want to see if
15 I'm right. It's my understanding that Seattle parks are, in general, open to the public
16 during posted hours, and if somebody is following the Seattle ordinances for how to use
17 the park and what's permissible and so forth, they don't have to get anybody's permission
18 to use it as long as they follow the rules and regulations right?

19 CW That is for the most part true, but I think there's some nuances to that that are subject to
20 interpretation. So, an example of that might be-- so there's no camping in a park, but
21 you've got a sleeping bag and accoutrements for camping and a pop tent, and you are
22 obstructing other legitimate uses of park, so basically we-- Let me back up. The way we
23 interpret the rules and those ordinances is that anybody can use the park during park
24

1 operating hours. You cannot use a park in such a way without a permit that abstracts the
2 public use of the park, so--

3 DT Or that violates the regulations on how the use--

4 CW Or that violates the regulations or the rules

5 DT Right. That's what I understand. So, in order to use the park in a way that doesn't follow
6 the usual regulations, that's when you have to get a park use permit.

7 CW That's when you need a permit.

8 DT Okay. Okay.

9 [00:19:10]

10 DT And so in the Parks-- I again, I think I know the answer to this but I'm gonna ask you
11 anyway. When someone applies for a park use permit, who in this department normally
12 issues it?

13 CW So Jeff Hedges normally issues the permit and, yeah I mean, Jeff is-- has the authority to
14 issue the permit at that level.

15 DT Okay. And so given that a permit is issued in general for exceptions to the normal park
16 use, I gather then that Jeff has discretion on what uses to allow and what ones not to
17 allow. Or what exceptions to make-- when to make an exception and when not to make
18 an exception.

19 CW Right.

20 DT Okay. And then, you also, does Jeff ever consult you?

21 CW All the time.

22 DT About whether or not to issue a permit?

1 CW Right. Or the conditions to impose on a permit, or the length of the permit, or the
2 location of the permit, or you know, if a group is wanting to, you know, have alcohol in a
3 park, or engage in some other activity that really is not compatible with our park and
4 recreation mission.

5 DT I can't remember if I asked you this, but are there any written guidelines or rules for when
6 to issue a permit and when not to issue a permit?

7 CW Well, we do have park use guidelines, so park use guidelines are some guidelines that
8 generally try to advise what the-- what activities a person can reasonably be expected to
9 do in a park

10 DT Without anybody's permission?

11 CW Well either without anybody's permission or through the permit process. So, these
12 guidelines-- for example, use guidelines typically tell a prospective user of a park if you
13 have a concert that provides sound. Well, that wouldn't be a use guideline in a park that
14 was adjacent to a neighborhood, for example. Or a park where a person might have a
15 special event and 5000 people, we probably wouldn't permit that in a place that didn't
16 have parking or impacted the neighbors' ability to get to and from their homes, so--

17 DT Are those written down?

18 CW Park use guidelines are written down.

19 DT Are they different than-- Okay, so that's a different set of written things that the policies
20 of the department in the permitting process is that what you're talking about well

21 CW Well the Park use guidelines are part of the information that Jeff uses to make decisions
22 about what activities and events can occur in a park.

23 DT Okay. But can he also-- and you also use your discretion--

1 CW Absolutely.

2 DT To permit things that aren't necessarily talked about under the park use guidelines?

3 CW Yes. Yes.

4 DT And do you do that all the time?

5 CW Not all the time.

6 DT Use your discretion in that way?

7 CW We do use our discretion sometimes, however, in this business it's important to be as
8 consistent as possible.

9 [00:22:40]

10 DT Okay, prior to October 5th of last year do you recall ever getting the mayor's office
11 involved in whether or not to issue a park use permit and/or the conditions under which to
12 issue one?

13 CW All the time.

14 DT Oh, that's pretty frequent.

15 CW It's pretty frequent. There are events that have got such a sizable impact on traffic, on
16 Police Department, on public safety and security. Examples include Hemp Fest at Myrtle
17 Edwards Park, Seafair, you name it. There are lots of anomaly type situations that
18 emerge during the permitting process, where, you know you, either we've gone to the
19 executive and gotten some direction or advice, or the permit applicant has permit
20 applicants has either gone down that path, because we've denied--

21 DT If there Park use guidelines that govern-- I understood you to say govern when to issue a
22 park use permit, why does the mayor have to get involved? Why don't you just say, well-

23 -

1 CW While guidelines are just guidelines and we have to exercise some judgments and some
2 discretion, some experience on top of those guidelines, so you know, if there is a situation
3 which, you know, are going to have some unintended consequences down the road, some
4 ramifications, adverse impact on adjacent owners, or rather business owners or neighbors.
5 One of missions is to be a good neighbor. So taking that into consideration we have to
6 make sure that the activities that occur in a park doesn't firstly impact neighbors.

7 DT To one degree or another, all public protests downtown make somebody mad.

8 CW Yeah. That's true. I'm a big supporter of the whole Occupy Movement.

9 DT Uh huh.

10 CW Yeah. Oh, I'm a one-percenter.

11 DT Okay. A one-percenter, or a ninety-nine-percenter?

12 CW Or, I'm sorry, a ninety-nine-percenter.

13 DT Okay. how does one apply for a park use permit?

14 CW Well, you go online and they have an online application and you fill out your application
15 online, you eventually contact someone at our special permit office and you begin to sort
16 of go through the permit rev-- the application review process. Jeff and his staff lay out a
17 number of steps, particularly if it's gonna be an impact to parking, traffic, amplified
18 sound, the type of event may warrant additional police support. Let's see, a permit from a
19 SDOT, you may have to go through several administrative processes and other
20 departments to obtain a permit with the city, so I think the other thing that's really
21 important, important distinction and nuance here, is depending on the size of the permit,
22 it becomes a rather-- It's only a Park Department permit when the size of the permitted
23 activity involves 50 or fewer people. When you get over that threshold of 50 people,

1 because of the impact on other city services and activities, it becomes a citywide special
2 event permit. So there's a distinction between the size and impact and location the Park
3 Department has the authority to issue special event permits for events under 50 people
4 that don't have a lot of spillover impact on the surrounding adjacent streets, neighborhood
5 community, an individual is required to obtain a citywide special event permit which is a
6 collection of several city departments: police, fire, SDOT, and other city agencies that
7 have an interest, an ownership interest, a stakeholder interest, and the impacts that are
8 generated by the special event activity, and the citywide special permit process is the
9 Mayor's citywide special event permit process, so based--

10 DT So he has to go to the event office then?

11 CW Well up until December, the park special permit office and the citywide special
12 permit office were all housed in Parks. Now, with some budget changes, Parks has its
13 administrative permitting process that we do for events that are, you know, that include
14 impact of impact 50 people or less, but the Mayor has a citywide special event function,
15 where it brings several departments together to review the impacts of a permit permitted
16 activity on, you know, all the ordinance of the city, so it's got an impact on police, fire,
17 human services, the Mayor special event permit person has to approve that.

18 DT Last October, who was in charge of issuing citywide special event permits?

19 CW That would have been Joanne Orsucci.

20 DT Do you now how to spell that?

21 CW Orsucci O-R-S-U-C-C-I. She's in the office of economic development and I can get you
22 her phone number.

23 DT Okay is she now at the Mayor's office?

1 CW No she's at the Office of Economic Development.

2 DT For the city?

3 CW For the city. Yes. And that rationale being that special events are an economic
4 development activity for the city.

5 DT Okay so was she involved last Fall when the whole decision-making process on Occupy
6 Seattle at Westlake--

7 CW I believe she was involved at the permit level, but most of it was Jeff, and again, from our
8 apartment, you had park rangers being involved, you had the park security manager,
9 Brock Milliern, being involved.

10 DT In the permitting decision?

11 CW No, I'm sorry, I'm just talking about in general. But in the permitting decision, mostly
12 Eric Lee and Jeff Hodges.

13 DT Okay. Okay.

14 CW From our department.

15 DT Okay. Does the permit application always have to be in writing in order for somebody to
16 get permission?

17 CW I think it does.

18 DT I mean is required? Do the rules require it?

19 CW Our process certainly requires it, but I can't think of...

20 DT Do you ever get temporary permission pending the, you know, handling of paperwork?

21 CW Yeah, but I think we try not to do that, if a person, at the point a special event is going to
22 happen, a person has a permit or they don't. So that's, I mean, you can do a lot of things
23 up to the day of the event, but I mean, you either have a permit or you don't.

1 [00:30:20]

2 DT When park use permit applications are denied, are they usually denied in writing or just
3 orally?

4 CW I believe they are denied in writing

5 DT And is that the denial-- is that record kept?

6 CW You know, I think-- I believe Jeff would have a process for that.

7 DT Okay are you ever denied just orally?

8 CW You know, they may be told orally, but in most cases, if they're gone through the trouble
9 to submit a written application, they receive something back in writing.

10 DT And what they receive back in writing: Does it give the reasons for the denial? Is
11 required to give the reasons for the denial?

12 CW I believe it is. Yeah. And most cases, it's been my experience that we don't do-- or rather
13 in a lot of cases even if we deny at one location we might recommend three or four more
14 suitable locations, or we might deny and say, "Look, here, if you can we meet other
15 conditions then maybe we can work [noise]

16 DT Okay.

17 CW We're pretty liberal in our permit approval process, just because we want events to
18 happen, you know?

19 DT Do you ever issue events to take place, Westlake Park, for example, to take place after
20 normal closing hours?

21 CW We try not to do that.

22 DT Do you ever allow structures to be there after normal closing hours?

1 CW We have for the Occupy event, certainly. We have for, you know, when vendors come in
2 sometimes, setting up, and maybe they want to leave it overnight, we have the annual
3 carousel that is there for 30 consecutive days overnight, so--

4 DT Who runs that carousel?

5 CW The Downtown Seattle Association.

6 DT That's an association of businesses downtown?

7 CW Yes. Yeah.

8 DT Okay so they're allowed to keep that. How about Target? Do you remember issuing a
9 thing for Target?

10 CW I believe we did allow Target to keep some stuff up overnight. So it's not uncommon that
11 we'd do that. You bet.

12 DT Okay. Have you ever heard of a process called "the abatement process" that relates to
13 parks and trying to stop something in parks?

14 CW Oh, home-- or, the encampment abatement process.

15 DT I think, and again I'm not an expert on the abatement process but I think it applies to
16 structures or things that are put up in parks that Parks Department doesn't want there.

17 CW So, it is a process that-- It's an administrative process that was developed to deal with the
18 proliferation of homeless encampments in our park system.

19 DT Okay.

20 CW And actually on city property whether it be a park or otherwise and, you know, we do
21 have an epidemic of people living in parks and parks erecting tents, erecting structures,
22 living in the park system, and we have a process that requires 48-hour to campers to

1 remove their structure, to remove the accoutrements in the park, and our staff along with
2 SPD come in and remove those through illegal encampment abatement process.

3 DT That 48 hour notice: Is that part of the city ordinances or is that part of internal
4 regulations of the Parks Department?

5 CW Okay, so the previous administration established a, I'd call it more of an administrative
6 process for the city, and it's not a process unique to Parks; it's a sort of umbrella set of
7 policies or guideline that direct departments how to approach the removal of
8 encampments. Again, these encampments don't exist only in parks. Almost every city
9 department has a land ownership.

10 DT I saw in the Seattle city ordinances, I saw a reference to an abatement process that
11 required 30 days notice. Are you familiar with that?

12 CW Okay I think that's something different. There are lots of abatements processes or so if
13 you have a structure built, okay? And you didn't get a permit, okay? DPD may give you
14 a 30-day notice to abate that, so I don't want to speak out of school here but there are lots
15 of different uses for the city's abatement process. They have an abatement process for
16 abandoned vehicles, an abatement process for illegal structures which is a Department of
17 Planning and Development process which is in no way related to the homeless
18 encampment abatement process that we use here.

19 [00:36:15]

20 DT Okay. Is there anyway you can tell me in any kind of a principled way -- I don't mean
21 that the way sounds -- I mean, are there rules or guidelines for when you would get the
22 mayor's office involved in a permitting request and when you wouldn't?

23 CW So, hard and fast rules?

1 DT Mmm hmm.

2 CW You know written down somewhere? No.

3 DT Okay.

4 CW From a sound judgment standpoint, from a responsible decision-making standpoint, and
5 keep in mind that we don't necessarily, are initiating getting the mayor's office involved.
6 They mayor's office will frequently initiate a discussion with us.

7 DT How about you initiating?

8 CW I would initiate a discussion with the mayor that would have-- would be driven by a
9 couple of values. The first being having a park land be open and accessible to the public,
10 so does a special event impact the general public's use of a park in such a way that it
11 impedes or prohibits sort of the free use of the park that's certainly known. Is there a
12 special event activity which has a popular community support, but which conflicts with
13 some of the management goals from the park, like amplified sound, being a good
14 neighbor, camping, sleeping over in a park. Are there activities in the park which are not
15 compatible with the core mission value process for the city, and for the Park Department?
16 You know, at one point it was found that Hemp Fest, because of its focus on marijuana,
17 was not compatible with -- and that was several administrations ago -- was not
18 compatible with sort of the park recreation mission. Again, the mayor's office got
19 involved with that at the time. So, from a standpoint of-- It's more of a judgement call
20 on our part. Impact on resource, is it precedent-setting?

21 DT Is it controversial?

22 CW Is a controversial-- Well, certainly is it controversial, does it-- and controversial I think
23 we interpret differently than I think I'm hearing you say.

1 DT Well, politically controversial like Hemp Fest?

2 CW No, not so much politically controversial in terms of Hemp Fest, but controversial from
3 the standpoint: Does it cause us not to be a good neighbor, controversial. We've got
4 13,000 neighbors across the city, being Seattle Park and Recreation.

5 DT But people often say you're not being a good neighbor when you're doing things
6 politically that I don't agree with.

7 CW Exactly. That argument will work two ways.

8 DT Okay. I mean, people who are complaining about a use will say, "Hey, they're not being
9 good neighbors because marijuana is a terrible thing."

10 CW Yeah.

11 [00:39:50]

12 DT Correct me if I'm wrong in this and looking at this way. For-- Do you know what I mean
13 by the word ministerial decisions? It's a word-- a term of art lawyers use.

14 CW Yes, I totally understand.

15 DT Okay. In terms of issuing park permits for, you know, kind of ministerial decisions, you
16 don't get the Mayor's office involved in those do you? Usually?

17 CW Not usually. But it's not unusual for the Mayor's office to be involved with those. So,
18 on--

19 DT And overrule them?

20 CW I wouldn't-- I-- So, from my perspective, I wouldn't say that it's odd at all for mayor's
21 office to weigh in on an issue that they care about. Now if you're comparing this with the
22 5000 or so permits we issue for picnic shelter rental, or for the wedding event, or for the

1 bar mitsvah or for the family reunion celebration, no, we don't get the mayor's office
2 involved in those.

3 DT But for political things that might get the neighbors riled up, the mayor gets involved in
4 those, doesn't he?

5 CW At their discretion.

6 DT Would that be one reason why you might notify the Mayor? Because there's a lot of
7 publicity, there's a lot of controversy, there's a lot of anger by some people over the
8 politics of the protesters? Would that be one reason why you might--

9 CW We was certainly keep the Mayor's office informed.

10 [00:41:51]

11 DT And again, just thinking about generally how organizations work, lower-level employees
12 make, in general, more ministerial decisions, and you get paid the big bucks, 'cause you
13 got broader things to think about.

14 CW Right. We make policies.

15 DT You make policy decisions.

16 CW Yeah.

17 DT Okay.

18 CW But I think the fine point I want to put on that, is in theory, that works great, and for the
19 most part we do make a whole range of policy decisions are made out of this office.
20 However, it is not unusual for the mayor to pick up the phone and give us a call, and to
21 notify us that they have an interest in an issue, and for us to respond to that interest. So--

22 It works both ways.

23 DT Yes.

1 CW Okay. I just want to talk a little bit of Westlake Park.

2 DT Did you grow up in Seattle?

3 CW I did.

4 DT Ah. So you know that whole history of, or at least in some fashion?

5 CW Yeah.

6 DT I moved out here around '78 and I think that was right around the time when the decision
7 was made to create that park.

8 CW Yeah.

9 DT I can't even remember what was there before.

10 CW Yeah, there was a J. K. Gills store there, a sort of an art store and the monorail went all
11 the way over to that side of the park so where the monorail currently ends, it used to
12 come all the way over to the where the park is, and there was a triangle-shaped store
13 there.

14 DT Ah. See, I can't even remember that. But Westlake Avenue came through there too,
15 didn't it? And it joined up with Fourth?

16 CW Yeah.

17 DT Okay, so '78, sometime in there, that plaza area was created and the big office store
18 building. What's that called?

19 CW Seaport Building.

20 DT Is that what it is?

21 CW Yeah.

1 DT Okay. 'Cause I think at that time, a lot of people wanted the whole thing to be a park, and
2 there not to be a skyscraper put down there. But it seems to me that Westlake Park is
3 different in a lot of ways than, say, Seward Park.

4 CW Oh, for sure.

5 DT I mean, it's a more urban park, it's not a big green space.

6 CW It's a public plaza.

7 DT It's a public plaza. And a--

8 CW And a gathering space.

9 DT Yeah, that was kind of the intent of it

10 CW A First Amendment park.

11 DT That's sort of the purpose of it.

12 CW That's the way we think of it.

13 DT Okay.

14 CW You bet.

15 DT For person walking around in that area, how would they know they're in the park?

16 CW Well--

17 DT As opposed to on the sidewalks, or--

18 CW That's sort of a technical question, because we don't believe that a person has to know
19 they've got one toe in the park. The entire space is managed as a park from the public
20 perspective, so even though there have been these arcane ownership issues between
21 Seattle Parks and SDOT, for the most part, we believe that the public perception of
22 Westlake is that it's a park, and we have managed it that way.

23 [00:45:16]

24

1 DT Well, people walk through that park all the time on their way to and from other locations
2 downtown.

3 CW Yeah.

4 DT And, but, the park's closed what, at 10:30 or something like that at night?

5 CW 10:30 to 5am. Something like that.

6 DT The sidewalks aren't closed.

7 CW Sidewalks are not closed.

8 DT How would a person know they're on the sidewalk there, as opposed to being in the park?

9 CW So, the reality is, is in terms of enforcement for closing hours of that park, if a person is
10 passing through that park or using it to traverse one end of Third Avenue to the other,
11 that's not something that's gonna trigger, you know, sort of the rigid enforcement.

12 DT Okay.

13 CW What about somebody sitting on a bench at 10:45 p.m.? Might that trigger parks ranger
14 to say, "You gotta get out of here"?

15 DT Most cases, not.

16 CW Okay.

17 [00:46:35]

18 DT So, as a practical matter, what does it mean to say Westlake Park is closed at 10:30?

19 CW Well, all parks have closing hours. Closing hours are primarily designed to regulate the
20 activity in a park. It's used on some ways to manage the behavior in our parks. It is also
21 consistent with, I think, with how we think broadly about park uses, and when the public
22 is expected to be in the park and when the public is not expected to be there. And bear in
23 mind we don't have staff that are dedicated to driving around our 416 parks to make sure
24

1 there aren't people there at, you know, 11:05 or 4:50 a.m. It only becomes a problem by
2 exception or there's some other behavior, sort of triggers an observation that, by the way,
3 you know, park is closed.

4 DT I often used to wonder, I lived by Seward Park, and I often wondered, there must be a lot
5 of people up in that forest campin' out at night.

6 CW That's a problem way more than I can even characterize to you across the system, which
7 is really a good neighbor problem. If you live by Seward Park and you've got a fence,
8 you don't want a guy sleeping in your back yard just beyond your fence. That's a big
9 problem for the city.

10 DT Are any parks open to the public 24 hours a day?

11 CW Greenlake Park is open 24 hours a day.

12 DT Is that the only one?

13 CW It's the only one.

14 DT Why is that open 24 hours a day?

15 CW It is the most heavily-used park in the state, it gets over a million users a year, and it has a
16 long historic use of walkers, and there are certain park locations that, we just want the
17 public to be able to enjoy. And walking is, you know, the preponderance of use around
18 Greenlake, and it would be impossible to regulate or enforce that, so _____ is open 24
19 hours.

20 [00:49:14]

21 DT Did you say that there was a recent change in the ownership of the Westlake Plaza area?

22 CW Yes. So, we recently went through a process to vacate the street right of way, and the
23 vacation process is a process wherein an administrative process where the director of
24

1 SDOT makes an appeal to the adjacent property owner, and the other property owner,
2 which is Parks in this case, and appeals to them to give up a portion of their ownership in
3 the right-of-way, to vacate the right-of-way, because technically we own out to 10 feet in
4 front of your building. Well, since that ownership extended out into the right-of-way, the
5 vacation process goes through a process where it gets the adjacent property owners to
6 relinquish that ownership and in doing so, that gives 100% of the right-of-way to Parks,
7 so the street vacation process was a process probably that took over 8-9 months to come
8 to fruition. But we just went through that process in December, and now 100% of
9 Westlake is under Park Recreation ownership.

10 DT Including the southern part by the trees and all that. That wasn't true last October, was it?

11 CW It was not true last October. However, we were, we had undergone that process probably
12 way back in January, and it probably took well over a year.

13 DT Even though that wasn't true in October, Parks was still managing and applying park
14 rules to it.

15 CW You bet.

16 DT Okay. I want to-- October 5th was when my client got arrested in the park for obstructing
17 a police officer. And that was a Wednesday. And it's my understanding that the
18 protesters in the tents were in Westlake Park for some period of time, I don't know the
19 exact period of time, several days, possibly a week, before that, before they were
20 removed the first time. Do you know-- Can you be more any specific than I just was
21 about how long they were there before the first arrests were made?

22 CW So a lot of this was really sketchy to me, only because they had been there for a long time
23 before the city did anything. I think they were--

1 DT Like, a week?

2 CW Oh, a, boy, I think people were there several weeks, although I don't believe the so-- I
3 think the protest had been sort of evolving and emerging in the park, and there might
4 have been one or two campers staked out at the park, for well over a month.

5 DT Really?

6 CW Yeah, I think so, and tents, and tarps, and you know, these little pop-up kiosk things. It
7 wasn't until several weeks later, leading up to the arrest where all of the sudden one day,
8 or over a course of days, I believe there was a march from Capitol Hill, and again the
9 details are really sketchy here, so I'm not sure, but I believe several protesters marched
10 down and erected tents in the parks. We went from really very little impact on the park,
11 to wow, every square inch of this park is occupied by--

12 DT Was that true? Every square inch? I'll just tell you why I sound a little surprised at that:
13 I've seen videos of the events on October 5th, and it was really only the southern part.

14 CW Maybe not every square inch, but the southern part is a significant, so, from what we had
15 seen, from what I had seen, you know, comparably, there were significantly more tents
16 and people there than had previously been there. So you know, you could argue that yes,
17 people could still get around on the sidewalk, you could still walk around some of those
18 tents, but there were a lot of people then. I never counted tents.

19 DT Did you or anybody from Parks Department ever take any video or pictures of tents and
20 the protesters?

21 CW You know, I could ask around. I personally have never taken any media, or pictures, or
22 anything like that, of-- I could certainly ask around here to see which staff, you know,
23 Brock...

1 DT Brock said he didn't know of any pictures.

2 CW I've never seen any pictures.

3 DT Do you recall in the weekend before October 5th, so October 5th is a Wednesday, so that
4 previous Wednesday, there being discussions between protesters and/or their
5 representatives about staying in the park, and under what conditions they could stay in
6 the park?

7 CW You know, I would really-- So, on this, again, Eric handled most of the negotiations with
8 the seventh floor and the permit office, our permit office, this was quasi-special
9 assignment, and I asked him to take lead on, so, I believe Eric had been involved in the
10 majority of those discussions.

11 DT Okay. And, but, do you, I mean, did he talk to you about it?

12 CW Yeah, he would talk to me about it.

13 DT So, do you know that those kind of discussions were ongoing the weekend before
14 October 5th?

15 CW Yes. But we would've been taking direction from the mayor's office, so what's different
16 here is this is not a situation where we were making decisions or performing ministerial
17 duties on our own, certainly, a situation where we would have been taking direction.

18 DT Yeah, that was my understanding, that the mayor at that point, was kind of in charge of
19 which direction this was gonna go. Do you remember Carl Marquar being involved in
20 those discussions?

21 CW Yes. I believe Carl was involved in those discussions, but again, I was not-- So let me
22 back up. At some point, after there began to be a stronger mayoral role on this issue, I
23 asked Eric to staff this issue.

1 DT And that was before October 5th?

2 CW Yes. That was before Ocrober 5th. So, while, I'm not real certain about the discussions
3 because at some point I wasn't in a lot of the discussions.

4 DT Okay, so even though you weren't in the discussions, do you know whether during that
5 weekend of October 5th, the mayor's office was indicating that permit would be issued
6 Monday but there were just talking about the conditions under which the permit would be
7 issued? Do you know if that was happening?

8 CW I believe there was some discussion. There's been ongoing discussion about permits and
9 permit conditions with this group, so it's possible to me that there have been those
10 discussions. But again, I believe Eric had been involved, and the details of those
11 discussions.

12 DT I understand that. But do you have an understanding that that's where those discussions
13 were at?

14 CW Yeah.

15 DT Okay. And then at some point, that changed, and the decision was made at at the mayor's
16 office, they gotta go. Do you know that happened?

17 CW Yes.

18 DT And do you know why that happened? Why that position was made?

19 CW I think it was the mayor's office perceived perceived impact that they were, actually had
20 taken over the park at some point. So it wasn't just a sort of regular use; it had become a
21 use that prevented other people from using the park, so it became almost an exclusive
22 park usage situation.

1 DT Do you know if the mayor's office ever said, "Okay, Occupy Seattle, you can keep
2 protesting, you can keep having tents there, but you can only have so many tents, you can
3 only have them, you know, so close together." Did they ever talk about those sorts of
4 conditions?

5 CW I think-- I believe what this mayor's office tried to say to them was, "Okay, so you can't
6 camp at Westlake Park."

7 DT But did they ever say, "Yeah, we think that's going to be permissible but we gotta talk
8 about the conditions under which you can do it"?

9 CW I don't recall that.

10 DT Okay.

11 CW I don't recall that. That doesn't mean it didn't happen; it only means that at some point I
12 was not involved in those day-to-day discussions because we have a whole department to
13 run, so, yeah. But the other thing I wanted to say, I think, on the mayor's behalf, is I
14 recall the administration wanting to support the Occupy Movement. So much so, did
15 they want to support this, that they gave them space at the, down at City Hall, and even
16 during inclement weather, not only gave them space for their tents, but also gave them to
17 come indoors to some hallway foyer there to--

18 DT That's a lot less desirable place for protesters, isn't it? There's not as much traffic, there's
19 not as much notice?

20 CW I think what they were trying to do is show support and say to the--

21 DT While still kicking them out of the park--

22 CW protesters, you can come back the next day and set up.

23 DT Really? They said you can come back the next day and set up your tents?

1 CW Well, they said, "You can come back the next day and do your protests"

2 DT But not with tents.

3 CW Not with tents.

4 DT But the tents themselves were part of the political statement, weren't they?

5 CW Yeah.

6 DT The area around City Hall, that's not any Parks Department--

7 CW No.

8 DT So you didn't have anything to do with that?

9 CW No.

10 DT Okay.

11 [1:00:33]

12 DT Were you-- Did the mayor's office get involved with the permitting process with the
13 Occupy Seattle protesters last fall because you asked them to, or did they just take that
14 initiative on their own?

15 CW You know, again, I think the executive has broad discretion to convene several
16 departments. So it wasn't just Parks involved in this issue. This was a big city issue that
17 included staff from several city departments weighing in on this issue: SDOT, Police,
18 Fire, Human Services, Planning and Development because there's certain DPD zoning
19 requirements, and the mayor's office used their convening code in order to bring several
20 departments together to discuss this issue. Again, the fine point on this is we certainly
21 heard from the mayor's office that they were interested in being part of the decision.

22 DT Right. Okay. That's what I thought. Were you at Westlake Park on October 5th when
23 the police arrested protesters and removed their tents?

1 CW I believe I was there that day. ` Yeah.

2 DT I'm gonna assume -- tell me if I'm wrong -- you wouldn't remember any specific
3 protesters, and what they were specifically doing, or people that were arrested?

4 CW No, I was sort of like 1000 other people, sort of standing. So at some point-- Lemme
5 back up. Our responsibility on that day was to notify people's property owner that they
6 had to remove their tent. If they complied with that, great. But we are not a law
7 enforcement branch. Our park rangers don't have that sort of authority--

8 DT Where did you stand while all this was going on?

9 CW I probably stood on the street, rather next to the sidewalk, Fourth Avenue, and sort of
10 walked around and observed the activity.

11 DT You didn't ever go tent-to tent, where the police and the, Brock Milliern

12 CW No.

13 DT Did you ever go down there to Westlake Park before October 5th to sort of check it out
14 and see what was going on down there?

15 CW I drove by several times. I actually come that way on my way to work, so I was able to
16 see that every day.

17 DT And I think you said you never took pictures.

18 CW Never took pictures.

19 [01:03:46]

20 DT As far as you new, the-- You know I want to do right now? I know our time is limited. I
21 can't play, I have a CD, I don't know who took it, of the removal of some of the tents.
22 There's woman in this, she might be Parks Department, I don't know, but I want to see if
23 you know who she is. Do you have a--

1 CW Yeah, I think we have a--

2 DT It won't play on my laptop, but it'll play on my desktop.

3 CW Okay.

4 DT I'm gonna pause this while we go do that.

5 DT Okay we're back on record here. It's your understanding that when the police went to
6 remove the tents on October 5th, what law were they breaking?

7 CW Well--

8 DT If any.

9 CW Okay, so I would think the law they were breaking was not having a permit for an activity
10 which required permit, which again is any activity that restricts or prohibits the public's
11 ability to enjoy the park.

12 J? It says you need a Real Player. You probably have that program on your computer.

13 CW Yeah, city won't let you download that. Thanks Jeanette.

14 DT I'll have to get that on my laptop. Real Player.

15 CW You can just download that. Get a 13-year-old. They'll know.

16 DT Okay, so, I stopped listening when she came in. So I think you said the law they were
17 violating was not having a permit to use the park in a way that required a permit.

18 CW Right.

19 DT Okay, which would be having tents there.

20 CW Right.

21 DT Okay.

22 CW Or, more specifically, the impact of their use prevented the rest of the public from using
23 the park.

1 DT Well, I ask you a little bit about that. And I guess we get to a fine line at some point. I
2 mean any use, just by the reason it takes up physical space prevents other use to one
3 degree or another.

4 CW Right.

5 DT So, I guess it becomes a judgement call at some point?

6 CW I think so.

7 DT And do you remember Target being there that weekend? That week? Around that time?

8 CW I don't know how close it had been certainly Target--

9 DT They had a big setup down there.

10 CW I believe Target was there the very first weekend the occupiers showed up, so that was
11 several weeks ahead of this October 5th event.

12 DT Target had, what, a semi-trailer, and some, I don't know what you call it tents, canopies,
13 and several other structures up there.

14 CW Canopies. Yeah.

15 DT Okay. They were up there overnight weren't they?

16 CW Yes, they were. They were there for a weekend.

17 DT And did they have somebody who stayed there with those structures overnight?

18 CW Well what most companies do when they rent the space, they will hire security to protect
19 their stuff in the park.

20 DT So they're there all night?

21 CW Yeah.

22 DT And I think you answered this earlier, but did the decision to remove the tenants on
23 October 5th come from the mayor's office?

1 CW Yes, I believe we were following direction from the mayor.

2 DT Are you aware of any damage to the park, caused by the protesters, Westlake Park, other
3 than getting it dirty?

4 CW Other than pressure washing it, no. No long-term damage.

5 DT Okay.

6 CW I think I heard a tree was broke or something later, but I couldn't attribute that to the
7 protesters.

8 [01:08:50]

9 DT The presence of the tents, and the protesters in the park, didn't create a substantial risk of
10 injury to persons or park property, or utilities serving the park, did they?

11 CW I'm sorry, can you repeat that?

12 DT Yeah.

13 CW The presence of the tents, and the protesters in the park, didn't create a substantial risk of
14 injury to persons or park property, did they?

15 DT No, I don't think it necessarily created a risk of injury or damage. I think, you know,
16 again, this is one of those judgement decisions when you take over or begin to use a
17 significant portion of the park, it does create a perception of limited access for the public
18 so I think it was the perception of access that sort of drove and drove thinking. The
19 perception of limited access.

20 CW Well, was that was that perception accurate?

21 DT I think it's pretty close to accurate.

22 CW But you don't know if it was ever asked of them to limit the number of tents, or to
23 condition a permit on limiting the number of tents.

1 DT I don't know.

2 CW Okay.

3 DT Do you know who and when, who told protesters, and when they were first told, "You
4 gotta go"?

5 CW Now this is not entirely clear on. I believe that that direction was-- I believe they were
6 given several days notice that they had to go.

7 DT By whom?

8 CW It would've been probably park rangers, I believe, that gave that notice.

9 DT Do you know-- Are you certain of that?

10 CW You know, you're getting into a sketch, pretty detailed, part of this, so, I don't know that
11 for sure.

12 DT Okay. Who would?

13 CW You know, again I think Eric and Brock would know that.

14 DT Did you participate in any meetings on how to evict protesters?

15 CW I believe there wasn't a meeting. But the eviction process was discussed, yes.

16 DT And how was it decided to do that?

17 CW Well I think it had already been decided to do that by the Mayor. I think at that we were
18 really talking about how the legal requirements for notification to campers. As I recall,
19 this removal was going to happen several days prior to happening so again my memory--

20 DT Like on Monday?

21 CW Leah like on Monday, Saturday or the previous week or something. It seemed like it drug
22 for really long time before--

1 DT Well what surprised me a little bit about you say is I thought you agreed earlier that there
2 were discussions previous weekend about the conditions under which they could stay.

3 CW Well, I put a finer point on that. So, what I said was, the mayor was interested in figuring
4 out how he could support the Occupy Movement--

5 DT No, but I mean stay in Westlake Park. There were actual discussions with the Mayor's
6 office and the Parks Department the weekend immediately before October 5th that they
7 could stay in Westlake Park weren't there?

8 CW My recollection of that is that, the Mayor's office was saying to them that "we want you
9 to be able to continue to do your demonstration, but you can't stay overnight. And the
10 tents, we're gonna make space for you at City Hall, and you can camp out at City Hall
11 and you can return to Occupy Westlake Park during the day or during the park's open
12 hours." That's different. Rather I thought I was communicating that to you rather than
13 saying the mayor was trying to figure out under what conditions you could have X
14 number of tents and stay in the park. I didn't hear that.

15 DT Is it possible that that discussion went on and you just didn't know about it?

16 CW I didn't know about it if it did. What I heard was something completely different.

17 [01:13:58]

18 DT Were there any Park rules or regulations adopted, amended, or rescinded in response to
19 the Occupy Seattle protests?

20 CW No.

21 DT Is there a superintendent's hearing officer for some kind of appeals?

22 CW No.

23 DT Okay. It's you.

1 CW Well, it's me, and sometimes issues make it all the way down to the formal hearing
2 examiner, who works in the Office of-- I think they were for the City Clerk. And
3 basically, issues are having difficulty being decided through the department's
4 administrative process, people can request a hearing by the hearing examiner for the city.
5 And they review the application of department policies, and different situations, so they
6 basically are the final arbiter or interpreter of city policies.

7 DT Does that include park permitting, or issuance of park permits, or does that apply to other
8 kinds of disciplines?

9 CW Well you know you can take anything to the hearing examiner to examine any policy,
10 rule, or procedure by the city and get a ruling. They're considered to be impartial as
11 much they can be because they don't report to the executive you know, they're fairly
12 independent, they work for the city clerk.

13 DT Can the mayor overrule?

14 CW No.

15 DT Even for discretionary rulings?

16 CW Well, once it goes to the hearing examiner and you get a ruling--

17 DT But if it's discretionary, how can the hearing examiner decide whether to overrule?

18 CW Well, it is for policies, so where there's a policy or procedure or a guideline, those kinds
19 of issues go to the-- There's gotta be some documented.

20 DT So if the rule is being followed, not a discretionary thing.

21 CW Not a discretionary thing.

22 DT Okay.

23 [01:16:40]

1 DT I'm almost finished, so let me just take a look at my notes.

2 CW Very good.

3 DT We talked about Target having things up there, and Seafair used to have, like, bleachers
4 or other structures up at Westlake Park, didn't they?

5 CW Well the Seafair parade has a row of bleachers that sometimes are directed to front on
6 Fourth Avenue that actually do for seats there are permitted for torchlight parade.

7 DT And they keep those up overnight?

8 CW Yes.

9 DT Are you aware of any other activities or organizations were things that have received
10 permits to have things up in the park overnight, structures or tents or whatever.
11 Bleachers. Carousel. Oh, the carousel.

12 CW Yeah the carousel. It's not uncommon as long as we approve the use permitted. There's
13 no rule that says we can't permit some activity or some legitimate use of the park
14 overnight.

15 DT Okay I think for any more specific questions it sounds like I need to talk to Eric Friedly.

16 CW Yeah, he was running, he was my lead on this part, so he would know more specific
17 details on the permit process and certainly the conference calls. In fact, I don't think I
18 was in-- and that's how most of the decision making and permitting discussion at the
19 mayor's office happens in these conference calls.

20 DT Then, I think that's-- Is there anything else you want to add?

21 CW Nothing else to add.

22

23

24

1 DT Then, I'll end this here. You said before I could go out and get a copy of the code of
2 conduct, and the policies on permitting, and the park use guidelines. Let me turn this
3 tape off. It is 3:30.

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